

January 7, 2021

VIA E-FILING and COURIER

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: In Re: Commission's Review of the Benefits and Costs of Net Metering Credit Calculation Pursuant to R.I. Gen. Laws § 39-26.4-3: Docket No. 5010

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (the Company), enclosed for filing with the Rhode Island Public Utilities Commission (the Commission) please find the Company's supplemental response to PUC 3-2, issued by the Commission on June 3, 2020.

Consistent with the instructions issued by the Commission on March 16, 2020, and updated on October 2, 2020, this filing is being made electronically. Five (5) hard copies of this letter and the service list will be submitted to the Commission within twenty-four (24) hours, with two (2) hard copies being three-hole punched. As the Commission has requested these files in machine-readable format, the Company will not send hard copies unless requested.

If you have any questions, please contact me at: 781-907-2126. Thank you for your time and attention to this matter.

Very truly yours,



Laura C. Bickel
RI Bar # 10055

Enclosures

cc: Docket No. 5010 Service List

Docket No. 5010 Service List as of 9/10/2020
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Page

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PUC 3-2 Supplemental

Request:

Please provide the following data in machine-readable, csv tabular format for each customer account that is linked to a behind-the-meter net metering facility whose authority to interconnect was issued prior to January 1, 2020. Please group your responses into four separate csv tables, one file for customers whose net metering applications were processed using each of the four annual usage estimation methods listed above. Where each net metering customer account will constitute a row in the csv data table, provide the following:

File #1: customers with behind-the-meter net metering facilities that were approved using annual load estimation method 1:

- Columns (1-36): monthly usage data (kWh) for the 36 months immediately preceding the month of interconnection application filing, in the following order:
 - Column 1: monthly usage (kWh) from 36th month prior to month of interconnection application filing
 - Column 2: monthly usage (kWh) from 35th month prior to month of interconnection application filing
 - Column 3: monthly usage (kWh) from 34th month prior to month of interconnection application filing
 - Column 4: monthly usage (kWh) from 33rd month prior to month of interconnection application filing
 - Column 5: monthly usage (kWh) from 32nd month prior to month of interconnection application filing
 - Column 6: monthly usage (kWh) from 31st month prior to month of interconnection application filing
 - Column 7: monthly usage (kWh) from 30th month prior to month of interconnection application filing
 - Column 36: monthly usage (kWh) from 1th month prior to month of interconnection application filing (Column 37)
- Column (37): month and year that customer's net metering interconnection application was filed (this should be the date that columns 1-36 all correspond to for each customer)
- Column (38): customer rate class
- Column (39): system capacity of the net metering facility (kWac)
- Column (40): month authority to interconnect was issued for the net metering facility
- Column (41): fuel type of the net metering facility
- Column (42): town in which the customer account is located
- Column (43): Facility ID number (as listed in the Net Metering Report from Docket No. 5005)

File #2: customers with behind-the-meter net metering facilities that were approved using annual load estimation method 2:

- Columns (1-12): monthly usage data (kWh) for the 12 months immediately preceding the month of interconnection application filing, in the following order:
 - Column 1: monthly usage (kWh) from 12th month prior to month of interconnection application filing
 - Column 2: monthly usage (kWh) from 11th month prior to month of interconnection application filing
 - Column 3: monthly usage (kWh) from 10th month prior to month of interconnection application filing
 - Column 4: monthly usage (kWh) from 9rd month prior to month of interconnection application filing
 - Column 5: monthly usage (kWh) from 8nd month prior to month of interconnection application filing
 - Column 6: monthly usage (kWh) from 7st month prior to month of interconnection application filing
 - Column 7: monthly usage (kWh) from 30th month prior to month of interconnection application filing
 - Column 12: monthly usage (kWh) from 1th month prior to month of interconnection application filing
- Column (13): month and year that customer's net metering interconnection application was filed (this should be the date that columns 1-12 all correspond to for each customer)
- Column (38): customer rate class
- Column (39): system capacity of the net metering facility (kWac)
- Column (40): month authority to interconnect was issued for the net metering facility
- Column (41): fuel type of the net metering facility
- Column (42): town in which the customer account is located
- Column (43): Facility ID number (as listed in the Net Metering Report from Docket No. 5005)

File #3: customers with behind-the-meter net metering facilities that were approved using annual load estimation method 3:

- Columns (1-36): monthly usage data (kWh) for 36 months preceding the month of interconnection application filing (either from current customer or prior resident), in the following order:
 - Column 1: monthly usage (kWh) from 36th month prior to month of interconnection application filing
 - Column 2: monthly usage (kWh) from 35th month prior to month of interconnection application filing
 - Column 3: monthly usage (kWh) from 34th month prior to month of interconnection application filing

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5010

In Re: Benefits and Costs of Net Metering Credit Calculation
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- Column 4: monthly usage (kWh) from 33rd month prior to month of interconnection application filing
- Column 5: monthly usage (kWh) from 32nd month prior to month of interconnection application filing
- Column 6: monthly usage (kWh) from 31st month prior to month of interconnection application filing
- Column 7: monthly usage (kWh) from 30th month prior to month of interconnection application filing
- Column 36: monthly usage (kWh) from 1th month prior to month of interconnection application filing
- Column (37): month and year that customer's net metering interconnection application was filed (this should be the date that columns 1-36 all correspond to for each customer)
- Column (38): customer rate class
- Column (39): system capacity of the net metering facility (kWac)
- Column (40): month authority to interconnect was issued for the net metering facility
- Column (41): fuel type of the net metering facility
- Column (42): town in which the customer account is located
- Column (43): Facility ID number (as listed in the Net Metering Report from Docket No. 5005)
- Column (44): notes field to explain the timing and origin of the 36 months of usage data (including which columns correspond to the prior resident vs. the current customer, and the months/years of their respective usage data sequences)

File #4: customers with behind-the-meter net metering facilities that were approved using annual load estimation method 4:

- Column (1): the customer's estimated average annual usage (kWh) calculated by National Grid (based on customer load sheet data) and used to approve their net metering interconnection application
- Column (2): month and year that customer's net metering interconnection application was filed
- Column (3): customer rate class
- Column (4): system capacity of the net metering facility (kWac)
- Column (5): month authority to interconnect was issued for the net metering facility
- Column (6): fuel type of the net metering facility
- Column (7): town in which the customer account is located
- Column (8): Facility ID number (as listed in the Net Metering Report from Docket No. 5005)

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5010

In Re: Benefits and Costs of Net Metering Credit Calculation
Responses to Commission's Third Set of Data Requests
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Response:

Please see the attached .csv files, named PUC 3-2 File 1 through PUC 3-2 File 4, formatted as specified above. National Grid tracks application and system data separately from billing and production history, and combined account and premise information to categorize systems into each of the four scenarios. In order to determine which scenario a system best fit into, the Company evaluated four main criteria: Premise Number, which indicates a system's unique location independent of billing customer; Billing Account Number, which indicates a billing customer's usage/credits/generation at a given premise; Submission Date, which indicates a system's application date for the Net Metering program by the current billing customer at a given premise; and Bill Cycle End Date, which indicates the last date of production recorded for a billing account and its associated premise. For the purpose of this response, "months" and "billing cycles" will be used interchangeably, despite the Company completing 20 distinct billing cycles each calendar month.

File 1 includes all systems with the same Premise and Billing Account for all 36 months of billing history prior to the date of interconnection application filing (column 37). Average annual usage in this scenario is calculated based on the average of usage from each of the 36 months.

File 2 includes systems with a Billing Account Number that was the same at a premise for at least 12 billing cycles prior to the Submission Date of their Net Metering application. These projects may have had more than 12 billing cycles-worth of usage data, but they have less than 36 billing cycles of data available. Average annual usage in this scenario is calculated based on the latest year of usage by the current occupants of a site in order to reflect their habits most accurately.

File 3 includes systems with a Premise Number with at least 36 months of usage history available, but with less than 12 months of data for the Billing Account associated with the Net Metering Application. Usage data at the same premise, but by the previous Billing Account, is used to complete the 36 months of data needed to calculate average usage. This scenario also applies to Premises with less than 36 months of total usage history, with the best available usage history coming from two separate billing accounts. Average annual usage in this scenario is calculated based on available data from the customer who submitted a Net Metering application, as well as some usage by the preceding customer at the same premise. Column 44 could not be completed in the timeframe allotted, as it would require manual lookup of ownership change details for each of the 626 facilities on the list.

File 4 includes systems with 0 months of usage history prior to the Net Metering application date. These systems are often at newly constructed sites and/or do not have a billing history with the Company. This scenario may also apply to customers who have less than 12 months of usage history at the premise, but where the premise has no previous associated accounts. Average annual usage in this scenario is calculated based on the customer's completed system specification sheet.

The Narragansett Electric Company
d/b/a National Grid
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Supplemental Response:

The Company reviewed the list of net metering accounts that it intended to submit to the Commission on July 11, 2020. Its records reflect that it has had a total of 3,827 active net metering accounts since 1999, although it had previously counted 3,828 accounts, and submitted even fewer in the response filed due to a file conversion error. The Company's original figure of 3,828 appears to have been a miscount.

Because the Commission questioned the Company's low count of customers taking net metering service under the commercial and low-income rate classes in its original response filed, the Company examined a list of net metering accounts within those rate classes. The flaw in the Company's original filing appears to have occurred from the Company's transference of incomplete lists (i.e., less than 3,827 net metering accounts) from one file format (Microsoft Excel) to another (CSV). It was not the result of a large miscount. Attached here are substitute electronic files. The Company's current count of net metering accounts is the result of a rigorous manual comparison of internal identifiers between its Customer Information System (CSS/CIS) and its distributed generation (DG) records, namely comparing premise numbers (system location), account numbers (billing customer), and Facility ID numbers (DG Application ID).

The Company's sum and classifications of its net metering accounts are as follows:

	DG Application Submitted before Dec 1, 2011	DG Application Submitted on or after Dec 1, 2011	All Accounts
File 1	25	1,705	1,730
File 2	20	840	860
File 3	2	194	196
File 4	158	883	1,041
Totals	205	3,622	3,827

The table above notes that the Company's first Net Metering Provision, R.I.P.U.C. No. 2075, requiring the three-year annual average usage calculation became effective in December 2011, but some customers were already net metering. Also, the Company only has net metering customer usage data readily available after 2006. For that reason, the Company included the net metering accounts opened between 1999 and 2006 within File # 4, which contains new accounts, on a new premise, with no usage history.